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RECEIVED
MAY 19 2025
CLERK, U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

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9 UNITED STATES DISTRICT COURT
10 FOR THE DISTRICT OF MINNESOTA
11

12 Steve Salvador Ybarra
13 Self-Represented
14 Pro Se Litigant,

15 Plaintiff,

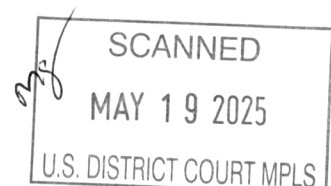
16 v.

17 Legal Assistance of Dakota County;
18 Sharon Jones Esq., in her Individual
19 and
20 Official capacities;
21 Hon. David Lutz, in his individual
22 and
23 Official capacities;
24 Hon. Tanya Obrien, in her individual
25 and official capacities;
26 Hon. Danna L Edwards, in her
individual and official capacities;
Lydia Clemens, in her individual and
official capacities;
Michelle Cathleen Ybarra,
Attorney General Keith Ellison, in his
individual and
Official capacities;
Assistant Attorney General Jeff
Timmerman, in his individual and
Official capacities;

27 Defendants.
28

No. . 0:25-cv-01948-KMM-DJF

**PLAINTIFF'S STATEMENT OF
DAMAGES IN SUPPORT OF
MONETARY RELIEF, SETTLEMENT
CONSIDERATION, AND NOTICE OF
READINESS FOR TRIAL**



1 **PLAINTIFF'S STATEMENT OF DAMAGES IN SUPPORT OF**
2 **MONETARY RELIEF, SETTLEMENT CONSIDERATION, AND**
3 **RECOGNITION OF LITIGATION-INDUCED COLLAPSE**
4

5 Plaintiff Steve Salvador Ybarra submits the following blended statement of
6 damages and request for monetary relief under 42 U.S.C. §§ 1983, 1985(2), and 18
7 U.S.C. § 1964(c) (RICO), along with a declaration of litigation-induced collapse
8 supported by constitutional authority and request for structured resolution or trial
9 scheduling.

10
11 **1. Compensatory Damages**

12 Plaintiff has now been denied access to his minor children for over eight (8)
13 months due to a procedurally sealed fraud pattern involving false affidavits, judicial
14 concealment, contempt-based retaliation, and ongoing obstruction. These events
15 have caused compounding harm.

- 16 • **Loss of parental time and consortium (8 months):** \$400,000
- 17 • **Emotional distress and mental anguish:** \$250,000
- 18 • **Litigation costs, filings, research, opportunity cost, and life**
19 **disruption:** \$2,355,000
- 20 • **Reputational injury and sealed contempt threats:** \$75,000

21 **Subtotal (Compensatory Damages): \$3,080,000**

22 Effective May 2025, Plaintiff reserves the right to increase compensatory
23 damages by **\$50,000 per month** for each additional month of deprivation,
24 retaliation, and delay.

25
26 **2. Punitive Damages**

27 Punitive damages are warranted under *Smith v. Wade*, 461 U.S. 30 (1983) due
28 to repeated acts of willful concealment, post-notice entrenchment, and deliberate

1 suppression of Plaintiff's constitutional rights:

- 2 • **Sharon Jones** (sealed affidavit fraud): \$150,000
- 3 • **Michelle Ybarra** (documented perjury and concealment): \$100,000
- 4 • **Judge David Lutz** (retaliatory threats, suppression, Canon violations):
- 5 \$150,000
- 6 • **Lydia Clemens** (neutrality breach, suppression of CPS recission): \$100,000
- 7 • **Jeff Timmerman** (Rule 11 violations, concealment of sealed Exhibit 312):
- 8 \$150,000
- 9 • **Keith Ellison** (enterprise ratification and systemic oversight failure):
- 10 \$150,000

11 **Subtotal (Punitive Damages): \$800,000**

12

13 **3. RICO Treble Damages (18 U.S.C. § 1964(c))**

14 Due to enterprise-level entrenchment by Legal Aid, judicial actors, and the

15 Office of the Attorney General, Plaintiff seeks treble damages for financial and

16 constitutional deprivation.

- 17 • **Base Losses (economic/litigation):** \$300,000
- 18 • **Treble under 18 U.S.C. § 1964(c):** \$900,000

19

20 **TOTAL DAMAGES DEMANDED: \$4,780,000**

21 Plaintiff submits this damages statement in conjunction with his prior

22 Emergency Motion for Financial Relief, previously filed under Elrod v. Burns,

23 Boddie v. Connecticut, and Tennessee v. Lane, documenting that:

- 24 • Plaintiff has been effectively locked out of his children's lives and judicial
- 25 recourse
- 26 • He is four months behind on rent, facing eviction, with utilities disconnected
- 27 • He has invested over 3,000 hours in litigation, without relief, access, or
- 28 response

1 This is not delay—this is **judicial entrenchment weaponized against a**
2 **protective parent** through sealed process and government-backed obstruction.

3 Plaintiff remains open to a structured, global resolution that includes:

- 4 • Vacatur of all protective orders and sealed contempt findings
- 5 • Correction of the public and sealed record
- 6 • Restoration of unimpeded parenting time
- 7 • Financial compensation and acknowledgment of procedural harm
- 8 • Permanent non-retaliation protections

9 Absent such a resolution, Plaintiff is trial-ready and hereby requests this
10 matter be set for jury trial.

11
12 Respectfully submitted,

13 **/s/ Steve Salvador Ybarra**

14 Steve Salvador Ybarra

15 Pro Se Litigant

16 California | Minnesota

17 Email: Steve@TheoryWerkx.com

18 Phone: (612) 544-4380

19 Footnotes (All citations to U.S.C. and Federal Rules unless otherwise noted)

- 20 1. *Carey v. Piphus*, 435 U.S. 247, 263–64 (1978) (*compensatory damages may be awarded for loss of parental liberty and*
21 *constitutional due process violations*).
- 22 2. *Memphis Cmty. Sch. Dist. v. Stachura*, 477 U.S. 299, 307–09 (1986) (*emotional distress damages are recoverable for*
23 *violations of constitutional rights under § 1983*).
- 24 3. *Fox v. Vice*, 563 U.S. 826, 834–35 (2011) (*litigants may recover reasonable costs and burdens tied directly to vindication*
25 *of constitutional claims*).
- 26 4. *Owen v. City of Independence*, 445 U.S. 622, 633–34 (1980) (*reputational damage is actionable where caused by state*
27 *actor misuse of power*).
- 28 5. *Smith v. Wade*, 461 U.S. 30, 51–56 (1983) (*punitive damages available under § 1983 for reckless or callous disregard of*

1 *federally protected rights).*

2 6. 18 U.S.C. § 1964(c); see *George v. Urban Settlement Servs.*, 833 F.3d 1242, 1251 (10th Cir. 2016) (RICO liability
3 may extend to public-private entities engaging in enterprise fraud).

4 7. *Elrod v. Burns*, 427 U.S. 347, 373 (1976) (“The loss of First Amendment freedoms, for even minimal periods of time,
5 unquestionably constitutes irreparable injury.”).

6 8. *Boddie v. Connecticut*, 401 U.S. 371, 377–78 (1971) (access to courts is a fundamental due process right where civil liberty
7 interests are at stake).

8 9. *Tennessee v. Lane*, 541 U.S. 509, 523–24 (2004) (denial of meaningful access to courts implicates both due process and
9 equal protection under the Constitution).

10
11
12 **CERTIFICATE OF SERVICE**

13 I hereby certify that on **May 18, 2025**, I served a true and correct copy of the
14 attached:

15 **PLAINTIFF'S MEMORANDUM OF LAW IN OPPOSITION TO**
16 **DEFENDANTS' ANTICIPATED MOTION TO DISMISS UNDER RULE**
17 **12(b)(6)**

18
19 upon the following parties by email and/or U.S. Mail:

20 • **Legal Assistance of Dakota County**

21 Email: admin@dakotalegal.org

22 • **Sharon Jones, Esq.**, in her individual and official capacities

23 Legal Assistance of Dakota County

24 Email: sjones@dakotalegal.org

25 • **Jeff Timmerman** he/him/his

26 Email: (confidential)

27 Tel: (Confidential)

28 • **Michelle Cathleen Ybarra**, Respondent

1 Email: shellbel1@hotmail.com

2 This notice was served to all named parties via email where available and
3 U.S. Mail where necessary, consistent with Fed. R. Civ. P. 5(b) and Local Rule 7.1.

4 Respectfully submitted,

5 /s/ **Steve Salvador Ybarra**

6 Pro Se Litigant

7 Steve@TheoryWerkx.com

8 (612) 544-4380

9 Executed May 17, 2025

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